



DOCKET & FILE

May 2, 2011

Hon. Kiyo Matsumoto  
United States District Judge  
U.S. District Court for the Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

Re: *Sandra Barkley v. United Homes, LLC, et al.*, CV-04-0875 (KAM)(RLM)  
*Mary Lodge v. United Homes, LLC, et al.*, CV-05-0187 (KAM)(RLM)  
*R. & S. Gibbons v. United Homes, LLC, et al.*, CV-05-5302 (KAM)(RLM)  
*Dewitt Mathis v. United Homes, LLC, et al.*, CV-05-4386 (KAM)(RLM)  
*Miles and Lisa McDale v. United Homes, LLC, et al.*, CV-05-5362 (KAM)(RLM)  
*Charlene Washington v. United Homes, LLC, et al.*, CV-05-5679 (KAM)(RLM)

Dear Judge Matsumoto:

While I was employed at AARP Foundation, I was one of several attorneys who represented the plaintiffs in the above-referenced actions. I write to request a pre-motion conference to file a motion to withdraw as counsel, or in the alternative, permission to withdraw as counsel without a formal motion, pursuant to this letter.

Approximately two years ago, I left my employment at AARP Foundation. At that time, I entered a change of address in the Court's docket with the expectation that I would continue to work on these cases. However, my new job responsibilities have prevented my continued participation in these cases and the Center never entered into a retainer agreement with the plaintiffs in these cases. As the Court is aware, plaintiffs are represented by South Brooklyn Legal Services, AARP Foundation, and by Cowan Liebowitz & Latman, P.C. In light of this, and because the trial of these cases is scheduled to commence on May 9, 2011, I respectfully request leave of the Court to withdraw as counsel for the plaintiffs or in the alternative for a pre-motion conference to file a motion to withdraw as counsel.

Respectfully submitted,

/s/

Nina F. Simon  
Director of Litigation  
Center for Responsible Lending

The application to  
withdraw as  
counsel is granted.

s/KAM

So Ordered: u

**Kiyo A. Matsumoto**  
**U.S. District Judge**